

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.,

Defendant.

Case No. 1:25-cv-00275-JPH-MJD

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

DECLARATION OF BETHENA DASHER

I, Bethena Dasher, hereby declare and state the following:

1. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify to their accuracy.
2. On July 25, 2025, Register.com, Inc., the named Defendant in the above-captioned civil action merged with Network Solutions, LLC. The new entity is hereinafter referred to as the “Company.”
3. My name is Bethena Dasher, and I am a Senior Manager of the Legal Department of the Company.
4. I am over eighteen (18) years of age and competent to testify.
5. The Company is a web technology company that offers domain hosting services, including domain name registration, domain name transfers, domain expiration protection, and domain privacy services.

6. Individuals can access information about and sign up for the Company's services through the Company's website, which is made available at the following web address:

<https://www.networksolutions.com/>.

7. When an individual seeks information about the Company's services, he or she can submit an inquiry form on the Company's website. To complete the inquiry form, the inquiring individual is prompted to provide their basic biographical information, including his or her name, phone number, and email address, via a contact form on the Company's website.

8. Inquiring users are also explicitly advised of the following: "By submitting your information above, you expressly consent to Network Solutions and its affiliates contacting you."

9. Inquiring individuals are also advised of the following: "By submitting your information, you expressly consent to Network Solutions and its affiliates contacting you regarding your services and offering new services via the contact information you provide (including your mobile phone number), via an automatic telephone dialing system or pre-recorded call. You are not required to give consent in order to make a purchase with us or our affiliates and you can find additional information in our Privacy Policy."

10. Individuals who choose to complete the "Sign Up" process, and purchase the Company's services, are similarly prompted to provide biographical information (e.g., name, address, email, and telephone number) and are prompted to click a checkbox indicating their assent to be contacted by the Company.

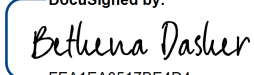
11. The text accompanying the checkbox states the following: "YES, I want to hear more about how Network Solutions can help me grow my business. By submitting your request, you agree to be contacted by one of our experts."

12. Below the checkbox, registering individuals can click an arrow for further details. When the individual clicks the arrow, the following text is presented: “I agree to receive communications which may be promotional in nature from Network Solutions or from our family of brands via residential, or mobile number, including text messages, (that may be autodialed or pre-recorded calls) to the contact information submitted. I understand that I can withdraw my consent at any time. You’re not required to give your consent as a condition of making a purchase.”

13. The aforementioned inquiry and registration processes are substantially the same as the processes in place prior to the merger of Register.com and Network Solutions, LLC which took place on July 25, 2025.

I swear under penalty of perjury that the foregoing is true and correct.

Dated: 8/27/2025

DocuSigned by:

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Bethena Dasher